

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**TEAL PEAK CAPITAL, LLC**

PLAINTIFF

and

**GERALD KLEIS-PASARELL**

PROPOSED CO-PLAINTIFF-INTERVENOR

VS.

**ALAN BRAM GOLDMAN**

DEFENDANTS

CIVIL NO. 20-1747 (PAD)

BREACH OF CONTRACT; SPECIFIC  
PERFORMANCE OF CONTRACT;  
REIMBURSEMENT OF FUNDS, COSTS  
AND EXPENSES

**MOTION FOR EXTENSION OF TIME TO FILE  
REPLY TO DOCKET 69 OPPOSITION TO MOTION TO INTERVENE**

**TO THE HONORABLE COURT:**

**COMES NOW, Gerald Kleis Pasarell (“Intervenor” and/or “Kleis”),** through the undersigned attorney and very respectfully states, alleges and prays as follows:

1. On July 6<sup>th</sup>, 2021, this Honorable Court granted Kleis’ Docket 71 Motion for Leave and Extension of Time to File a Reply to the Docket 69 Opposition to Motion to Intervene and ordered Kleis to file the Reply to the Docket 69 Opposition on or before July 16<sup>th</sup>, 2021.

2. The undersigned counsel requests a seven (7) day extension to file the Reply to the Docket 69 Opposition because he was unable to review and complete the Reply to be filed by July 16<sup>th</sup>, 2021. The undersigned was unable because he had to complete and file the Petition for Writ of *Certiorari* before the Supreme Court of Puerto Rico within the jurisdictional time limit in the case of *Vega v. Pep Boys*, First Instance Court Civ. No. SJ2020cv05968 & Court of Appeal Civ.

No. KLCE202100702.

3. The undersigned did begin to work in the Reply and in good faith believes that he will file the same on or before July 23<sup>rd</sup>, 2021.

4. This request is being made in good faith and is not intended to cause undue delay.

**WHEREFORE**, it is respectfully requested from this Honorable Court to 1) **GRANT** this Motion for Extension of Time to File Reply to the Defendant's Docket 69 Opposition on or before July 23<sup>rd</sup>, 2021., and 2) **ISSUE** any other order it deems just.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

**RESPECTFULLY SUBMITTED:** In San Juan, Puerto Rico on this 16<sup>th</sup> day of July, 2021.

**S/VICTOR M. RIVERA-RIOS**

VICTOR M. RIVERA-RIOS

USDC BAR NUMBER 301202

1420 FERNANDEZ JUNCOS AVE

SAN JUAN, PR 00909

Telephone: (787) 727-5710

Facsimile: (787) 268-1835

E-Mail: [victorriverarios@rcrtblaw.com](mailto:victorriverarios@rcrtblaw.com)